JOINT CMC STATEMENT

KERR

CASE NO. C-07-3645 JW

## JOINT CASE MANAGEMENT STATEMENT

As directed by this Court's order of March 12, 2008, the parties to the above-entitled action jointly submit this Case Management Statement. The parties incorporate by reference the case management statement filed on November 13, 2007 insofar as it describes the issues in this case. The parties are submitting this statement to address changes that the parties believe are necessary to the scheduling order entered on November 15, 2007 as a result of the withdrawal of Ms. Ramsay's former counsel and Ms. Ramsay's decision to proceed in propria personam.

The parties believe that it would be beneficial and efficient for the parties to engage in the ENE process prior to any depositions being taken. The parties request that an ENE be scheduled as soon as possible, and note that they have an ADR telephone conference set for May 1, 2008.

The parties request that the dates set by the Court on November 15, 2007 be extended by no less than three months so that there is sufficient time to conduct discovery, bring motions, and prepare for trial following the ENE session. Granting that extension would result in the following dates:

Close of All Discovery:	September 16, 2008
Last Date For Hearing Dispositive Motions	November 24, 2008
Preliminary Pretrial Conference	January 26, 2009
Preliminary Pretrial Conference Statements	January 16, 2009

DATED: April 24, 2008

Shannon Alynn Ramsay

Plaintiff In Pro Per

DATED: April 24, 2008 KERR & WAGSTAFFE LLP

By <u>s/</u>
MICHAEL VON LOEWENFELDT

Attorneys for Defendant The State Bar of California

I, Michael von Loewenfeldt, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Confidentiality. In compliance with General Order 45, X.B., I hereby attest that Shannon Alynn Ramsay, Plaintiff in Pro Per, has concurred in this filing.

DATED: April 24, 2008

KERR & WAGSTAFFE LLP

By <u>s/</u>
MICHAEL VON LOEWENFELDT

Attorneys for Defendant The State Bar of California

## CERTIFICATE OF SERVICE

I, Andrew Hanna, declare that I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Kerr & Wagstaffe LLP, 100 Spear Street, Suite 1800, San Francisco, California 94105.

On April 24, 2008, I served the following document(s):

## JOINT CASE MANAGEMENT CONFERENCE STATEMENT

on the parties listed below as follows:

Shannon Alynn Ramsay 2384 Belaire Court Los Gatos, CA 95033

By first class mail by placing a true copy thereof in a sealed envelope with postage thereon fully prepaid and placing the envelope in the firm's daily mail processing center for mailing in the United States mail at San Francisco, California.
☐ <b>By facsimile machine</b> (FAX) by personally transmitting a true copy thereof via an electronic facsimile machine.
☐ <b>By personal service</b> by causing to be personally delivered a true copy thereof to the address(es) listed herein at the location listed herein.
☐ By Federal Express or overnight courier.
I declare under penalty of perjury under the laws of the Untied States of America that the foregoing is true and correct.
Executed on April 24, 2008, at San Francisco, California.

Andrew Hanna